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SENT VIA ELECTRONIC MAIL

July 22, 2022

Denis B. Kler
U.S. Environmental Protection Agency (U.S. EPA), Region 4
Enforcement and Compliance Assurance Division
Policy, Oversight and Liaison Office
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
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Re: New-Indy Catawba LLC Response to EPA Clean Air Act Section 114 Information Request

Mr. Kler:

New-Indy Catawba LLC (New-Indy Catawba) owns and operates a pulp and paper mill in Catawba, SC (Mill). This letter is being submitted in response to the July 7, 2022 email from the United States Environmental Protection Agency (EPA) requesting follow-up information clarifying New-Indy Catawba's responses provided on February 10, 2022, March 7, 2022, and June 2, 2022 to EPA's January 21, 2022 information request pursuant to the Section 114(a)(1) of the Clean Air Act (CAA).

Documents responsive to this Request are located in the July 2022 folder at the link below for download by EPA.

https://parkerpoe.sharefile.com/d-sbde6a79bd70f4645b00c9a2d8db32639

New-Indy Catawba has conducted a reasonable investigation and review for documents and information responsive to this Request, and is providing these documents consistent with New-Indy Catawba's responses to previous information requests by EPA. As we have informed EPA previously, New-Indy Catawba purchased the Mill on January 1, 2019 so the Mill has limited access to documents and information prior to New-Indy Catawba's ownership of the Mill. New-Indy Catawba will continue to investigate and provide additional documents if they are located. New-Indy Catawba reserves the right to supplement this response as may be appropriate.

Question 11

The February 10, 2022, response from New Indy states the company does not measure the date, time and duration of when the steam stripper off gases are vented to the atmosphere. Section 63.443 requires owners to control gases from the LVHC system. Steam stripper systems are included in the definition of LVHC system under section 63.441, and the definition of steam stripper system includes all equipment used to remove compounds from wastewater or condensates. Section 63.450(d) requires the owner or operator of each bypass line in the close-vent system that could divert streams containing HAP to the atmosphere without meeting the emission limitation in section 63.443 to either install and operate a flow indicator, or maintain the bypass valve in the closed position with a closure mechanism. Please provide a discussion as to how the company complies with the requirements of 63.450(d) for the steam stripper bypass.

Response: Stripper off gas (SOG) is burned in the combination boilers. The motive force for the SOG system is the backpressure from the condensate stripping system. The backpressure on the system is controlled by an automatic valve in the main SOG line (PCV-030). Per the system safety design, the SOG system is equipped with three rupture disks and a main vent valve. The rupture disks and main vent valve status are continuously monitored by the distributed control system (DCS). If a rupture disk fails, if the main vent valve opens, or if issues are detected in the boiler flame management system, the stripper system DCS logic will close the PCV-030 automatic valve. The DCS control logic prevents the stripper (and associated SOG) from operating with a faulted rupture disk, with the main vent valve open, or with the boiler flame management system in a non-permissive status.

Question 68

The compliance date for existing sources was April 2001, but the 114 response only contained information from December 2015 (bleach plant scrubber parameter changes), November 2016 (bleach plant scrubber parameter changes), June 2020 (bleach plant shutdown, changes to #1 evaporator train, steam stripper shutdown), and August 2021 (condensate collection and treatment). Please provide the EPA with a complete copy of the initial NOCSR submitted in 2000.

Response: New-Indy Catawba has conducted a diligent search but has not located a signed copy of the initial NOCSR that was submitted approximately 19 years prior to New-Indy Catawba's ownership of the Mill. New-Indy Catawba has located the included unsigned NOCS dated October 11, 2002 and a letter to DHEC dated June 27, 2002, in which Bowater states it is choosing to comply with Subpart S by collecting a minimum of 11.1 lbs methanol/ODTP and treating a minimum of 10.2 lbs methanol/ODTP, in accordance with 40 CFR 63.446(c)(3) and 63.446(e)(5).

Further, New-Indy Catawba has located the included letter to SCDHEC, dated February 7, 2002, confirming that Bowater would achieve compliance with Subpart S by April 15, 2002, in accordance with Compliance Agreement #00-083-A.

Question 71

In a letter dated June 27, 2002, and the attached diagrams, the company stated that the turpentine decanter underflow was going to be collected as foul condensate under 40 CFR Part 63 subpart S. It is the EPA's understanding that the turpentine decanter underflow was not being collected for a period of time and now the turpentine decanter underflow is being collected. Please provide the date and reason that the turpentine decanter underflow ceased to be collected. Please provide copies of any documents that were submitted to SCDHEC concerning the turpentine decanter underflow stream not being collected. Please

provide copies of any documents that discussed how the removal of the turpentine decanter underflow stream impacted the amount of HAPs collected to meet the requirements of MACT subpart S.

The Jacobs Engineering Condensate Collection and Treatment Study (section 2.2.1, The LVHC system) dated December 1998, indicated that the vent streams from the four turpentine storage tanks are not collected. Provide a list of all the turpentine storage tanks at the facility. For each storage tank listed, indicate whether the tank is vented to the atmosphere or to a control system. If the emissions from the storage tank are sent to a control system, then provide the date the emissions from the storage tanks were sent to the control system. If the tanks are vented to a control system, please also provide a description of the control system.

Response: New-Indy Catawba is unaware of the date the turpentine decanter underflow ceased being collected, but collection was not necessary to meet the minimum 11.1 lbs methanol/ODTP collection requirement. In support of the Mill's initial Subpart S compliance, Bowater submitted a permit application dated August 19, 1999, stating that Bowater would collect a minimum of 11.1 lbs methanol/ODTP in accordance with 40 CFR § 63.446(c)(3). The original collection system was designed to collect all five (5) named sources due to the uncertainty of the methanol concentration in the streams. This was a very conservative approach for design purposes. Following initial compliance, the Mill installed a state-of-the-art continuous digester and associated bleach plant in August 2003. Due to the difference in the batch versus continuous digester operations, the methanol concentration in the named streams differed from the late 1990s studies. Following the process change, the Mill discovered the methanol was mainly in the evaporator foul condensate streams. Accordingly, the Mill began demonstrating compliance with the minimum collection requirements of 40 CFR § 63.446(c)(3) by only collecting the evaporator foul condensates.

The Mill completed a condensate methanol characterization study in late 2001 and early 2002. This pre-compliance methanol characterization study (Bowater received a one-year compliance extension until April 12, 2002, as noted above) demonstrated compliance with 11.1 lbs methanol/ODTP on five sampling days (December 5, 6, 7, 12 and 13, 2001) without collecting the turpentine decanter underflow. During the 5-day sampling period in which turpentine decanter underflow was not collected, the methanol collection ranged between 11.8 and 15.8 lbs methanol/ODTP, with an average collection of 14.1 lbs methanol/ODTP. The average methanol collection was 13.6 lbs methanol/ODTP during the final five days of the characterization study (January 28 through February 1, 2002), during which the turpentine decanter underflow was collected. This sampling data reflects that the methanol collected from the turpentine decanter underflow is nominal and not necessary for the Mill to demonstrate compliance with the collection requirements of 40 CFR § 63.446(c)(3). New-Indy Catawba is not aware of records discussing this change with DHEC because the Mill complied by collecting the required 11.1 lbs methanol/ODTP, not by collecting all named streams.

There are four (4) turpentine storage tanks at the Mill. Two of the tanks stored turpentine from the thermal mechanical pulp mill. Those two tanks were taken out of service when the thermal mechanical pulp mill was shut down in May 2020. The other two tanks (M14-0042 and M14-0041) are identical in design and are used to store turpentine from the kraft pulping process. Those tanks are equipped with a flame arrestor and are vented to the atmosphere. A drawing of these tanks is included.

Question 72

In your response to question 72 you provided a spreadsheet with steam stripper daily compliance calculations and annual condensate sampling results. On the daily compliance worksheet (column O), you

provided data on the amount of methanol removed under the heading of stripped condensate. Please provide a discussion of how the company calculated the amount of methanol removed.

In your response to question 72 you provided a spreadsheet with steam stripper daily compliance calculations and annual condensate sampling results. On the daily compliance worksheet, you provided a removal efficiency of 92% for a large percent of the time from January 2008 to present. The 2017 annual sampling results show a steam stripper removal efficiency of 87%, the 2018 annual sampling results show a steam stripper removal efficiency of 81.6%, and the 2019 annual sampling results show a steam stripper removal efficiency of 79.3%. Please provide an explanation for the discrepancy between the removal efficiency reported in the spreadsheet versus the removal efficiencies reported in the annual sampling results. Please explain why the steam stripper inlet methanol concentration was changed but the steam stripper removal efficiency was not.

In your response to question 72 you provided a spreadsheet with steam stripper daily compliance calculations and annual condensate performance evaluation results. The annual condensate sampling results did not include the calculated effective steam rate. Please provide the effective steam rate for each of the annual condensate evaluation results.

In your response to question 72 you provided a spreadsheet with steam stripper daily compliance calculations and annual condensate sampling results. The spreadsheet also included a worksheet titled effective steam efficiency. Please provide a detailed discussion on how the data was calculated and the tables generated, and provide the date the data and the graphs were generated. Please provide a list of each date the data and the graphs were re-verified, and provide a copy of the data and the graph for each time they were revised. Please provide a detailed discussion as to how the variation in the inlet methanol concentration is taken into consideration when determining the steam stripper removal efficiency using the effective steam efficiency calculation method.

Response: See the included Stripper Compliance Spreadsheet Mechanics document for a summary of the methanol removal calculations.

40 CFR § 63.453(n)(4) provides that, when selecting an operating parameter value, a facility should provide the rationale for the selected operating parameter value, including all data and calculations used to develop the value and a description of how the value demonstrates continuous compliance with the applicable emission standard. Bowater prepared a treatment efficiency curve utilizing the initial 2001 methanol characterization testing. The Mill updates the inlet methanol concentration each year using results from the annual compliance test. The steam stripper efficiency calculation is based on a regression of all data from the initial compliance testing and the 15-day engineering test. The regression is used to establish the minimum effective steam needed to meet the 92% treatment requirement. Any effective steam use over the value obtained from the regression line is assumed to be 92%, even though the actual treatment may be greater. See the included PowerPoint presentation (2019-01-Stripper Treatment Curve-Establishment.pptx) for additional information.

The effective steam for each annual condensate evaluation is included as the Stripper Daily Compliance spreadsheet.

The rational for the treatment curve establishment is included in the PowerPoint named 2019-01-Stripper Treatment Curve-Establishment, and the spreadsheet with the effective steam efficiency calculations is included as 2019-01-07-Stripper Treatment Curve-Establishment. New-Indy Catawba does not record each date the graphs and tables are generated or revised, beyond the dates that new data is collected and incorporated into the spreadsheet.

Questions 74-81

In your response to questions 74-81 (provided on March 7, 2022 and June 2, 2022) you provided information on closed vent systems and leak detection and repair documents. Section 63.454(b)(11) requires the operator to record the position and duration of opening of bypass line valves and the condition of any valve seals. Please provide a list of bypass line valves, and please provide a copy of the records for 63.454(b)(11) for each bypass line valve.

In your response to questions 74-81 (provided on March 7, 2022 and June 2, 2022) you provided information on closed vent systems and leak detection and repair documents. Section 63.454(b)(12) requires the operator to record duration of use of bypass valves on computer-controlled valves. The EPA is unable to locate the records containing this information for control valves CV-2006; CV-4041; CV-6025; CV-6064; CV-7022; CV-7049; CV-7075; CV-9029; CV-9051; CV-10003; and CV-11013. Please provide a list of all computer-controlled valves on bypass lines in the LDAR program, and please provide a copy of the records for 63.454(b)(12) for each control valve.

Response: The list of bypass values is included with the previously provided LDAR drawings and tables. There is no record of position for the manual valves because they are not opened while the equipment is operating, so these valves are closed unless undergoing maintenance or repair. The positions of the computer-controlled bypass valves are recorded in the programmable logic controller (PLC). A record of the instances when the bypass valves are opened is included.

All valves for bypass of the LVHC and HVLC collection systems are contained within the Environmental360 (consultant) drawings submitted in the response to Questions 74-81 (provided on March 7, 2022 and June 2, 2022). The computer-controlled valves CV-2006; CV-4041; CV-6025; CV-6064; CV-7022; CV-7049; CV-7075; CV-9029; CV-9051; CV-10003; and CV-11013 are from a 2013 version of Environmental360 drawings in which the naming convention was different from the Mill's naming convention. The list below contains the current Environmental360 names for LVHC and HVLC computer-controlled collection system bypass valves in addition to the Mill names within its PLC.

LVHC Control Valves		**Mill Designation**	**E360 Designation**
Area	**Equipment**	**PI Tag (Control Valve)**	
Powerhouse LVHC	Evap 1	24LBRPT.S2	CV-6069
Powerhouse LVHC	Evap 2	24LBRPT.S4	CV-6024
Powerhouse LVHC	Evap 3	24LBRPT.S6	CV-6141
Powerhouse LVHC	Stripper Feed Tank	24LBRPT.SA	CV-2005
Powerhouse LVHC	LVHC Header to CB1	26ZI042.PV	CV-5026
Fiber Line	Turpentine Decanter	24LBRPT1.S3	CV-8023
Fiber Line	Turpentine Stand Pipe	24LBRPT1.S5	CV-8054
Fiber Line	LVHC Gas Cooler	52HS174.pv	CV-10013
SOG Header	SOG Header Vent	51ZI041.PV	CV-5091
HVLC Control Valves			
Powerhouse HVLC	HVLC Header	52HS967.pv	CV-3040
Fiberline HVLC	Turpentine Cooler/Chip Bin Vent	52HS937.pv	CV-9003

Bypass valves of the LVHC and HVLC collection system are maintained in a closed state during operation, unless unsafe conditions or component failures occur that would require a bypass of the

collection system. During these periods of collection system bypass, the open computer-controlled valve position is recorded in the PLC. Periods of collection system bypass are reported semi-annually in the Title V reports, as well as the Subpart S compliance reports. The included spreadsheet contains excerpts from previous reports of LVHC and HVLC collection system bypass times. The Environmental360 and Mill names for the control valves that opened during the bypasses have been added for your convenience.

I certify that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001, 1341 and 1505.

If you have any questions or require additional information, please contact Dan Mallett at (803) 981-8010 or dan.mallett@new-indycb.com.

Sincerely,

Tony Hobson
Senior Vice President of Strategic Planning and Kraft Operations

CC: David Monroe, SCDHEC